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***Attorneys for Defendants Acquavella, Chiarelli, Shuster, Berkower & Co., LLP,
Joseph Acquavella, Santo Chiarelli, Samuel Shuster, and Maurice Berkower***

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

P. VAN HOVE BVBA, PASCAL VAN HOVE
GCV, JOHN THOLLON, MICHAEL ZABINKSI,
JEAN DOYLE, AND MARK LAROSA,
*individually and on behalf of all others similarly
situated,*

Plaintiff,

vs.

UNIVERSAL TRAVEL GROUP, INC., *et al.*

Defendants.

Case No. 2:11-cv-2164 (KM)(MCA)

**APPLICATION FOR PRO HAC
VICE ADMISSION OF PETER J.
LARKIN, ESQ. AND WILLIAM J.
KELLY AND CERTIFICATION OF
NICOLE B. LIEBMAN IN SUPPORT
OF SAID APPLICATION**

Pursuant to District of New Jersey Local Civil Rule 101.1, the undersigned, NICOLE B. LIEBMAN, ESQ., hereby respectfully requests that this Court enter an Order admitting PETER J. LARKIN, ESQ. and WILLIAM J. KELLY, ESQ. to practice before this Court pro hac vice, and, in support of his application, respectfully certifies as follows:

1. I am a member of the Bar in good standing in the United States District Court for the District of New Jersey and the State of New Jersey, and an associate with the law firm of WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP, attorneys for Defendants Acquavella, Chiarelli, Shuster, Berkower & Co., LLP, Joseph Acquavella, Santo Chiarelli,

Samuel Shuster, and Maurice Berkower, in the above-captioned matter. As such I have knowledge of each of the factual assertions set forth herein.

2. Peter J. Larkin is a Partner with this firm and William J. Kelly is also a Partner with this firm, both practicing in its White Plains office, and as such I am familiar with their biographical information. Based upon this information, more specifically set forth below and in the Certifications of Mr. Larkin and Mr. Kelly, both of them are competent to serve as attorneys to Defendants Acquavella, Chiarelli, Shuster, Berkower & Co., LLP, Joseph Acquavella, Santo Chiarelli, Samuel Shuster, and Maurice Berkower, and it would be in these Defendants best interest to have Mr. Larkin and Mr. Kelly admitted in this Honorable Court to represent them in the captioned matter.

3. Mr. Larkin and Mr. Kelly have been admitted to practice law since 1994 and 2001, respectively, and are admitted to the Bars as set forth in their Certifications which accompany this application. They are in good standing and are not now, nor have they ever been, subject to a disciplinary proceeding against them.

4. As Mr. Larkin and Mr. Kelly further set forth in their Certifications, they each possess special expertise, experience and knowledge pertinent to this case. This request to have these attorneys admitted *pro hac vice* comes from the client, who has expressed special trust and confidence in their representation based on their demonstrated ability in prior cases.

5. I have conferred with the counsel of record for the Plaintiffs and counsel of record for all of the Defendants who have appeared in the action, and counsel does not oppose the instant motion.

6. If admitted *pro hac vice* Mr. Larkin and Mr. Kelly would participate and assist in the representation of the Defendant Acquavella, Chiarelli, Shuster, Berkower & Co., LLP in the

above-captioned action. I will review, sign, and file all pleadings, briefs, stipulations and other papers filed with the Court by Defendants, will be responsible and appear for all court appearances, and will be responsible for the conduct of this action and for the conduct of the attorneys admitted *pro hac vice*, and will otherwise comply with all terms and conditions of Local Civil Rule 101.1(c).

7. For all of the above reasons, and those set forth in the Certifications of Mr. Larkin and Mr. Kelly, good cause exists to admit them *pro hac vice* to represent Defendants Acquavella, Chiarelli, Shuster, Berkower & Co., LLP, Joseph Acquavella, Santo Chiarelli, Samuel Shuster, and Maurice Berkower. I am aware of the requirements for compliance with pertinent procedural and ethical rules and will oversee compliance therewith. Mr. Larkin and Mr. Kelly are aware of these requirements as well, as set forth in their Certifications, and the proposed form of order requires compliance with the pertinent procedural and ethical rules.

8. I certify that the foregoing statements made by me are true. I am aware that if any of the statements made by me are willfully false, I am subject to punishment.

/s/ Nicole Liebman

Nicole B. Liebman, Esq.

Dated: November 24, 2015